

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: CASE NO. 16-56404 - WLH

Gregory Bernard Dawson, II,
Debtor,
CHAPTER 7

Gregory Bernard Dawson, II,
Movant,

v.

CONTESTED MATTER

Multibank 2009-1 RES-ADC Venture LLC,
Respondent.

MOTION TO AVOID JUDICIAL LIEN ON EXEMPT PROPERTY

This Motion of the Debtor respectfully represents:

1.

On April 11, 2016, Debtor filed a Voluntary Petition in Bankruptcy for relief under Title 11, Chapter 7 of the United States Code.

2.

Debtor files this Motion under 11 U.S.C. § 522(f) to avoid a judicial lien which has attached to property of the Debtor through action of law following a monetary judgment obtained by Respondent on November 18, 2014, in the Superior Court of Fulton County, Georgia.

3.

Said judicial lien impairs Debtor's interest in property which Debtor would ordinarily be able to exempt under 11 U.S.C. § 522 and O.C.G.A. § 44-13-100.

Wherefore, Movant prays for a judgment against Respondent for the cancellation and avoidance of the said judicial lien.

KING & KING LAW LLC

/s/ 

Seth A. Evans, Attorney for Debtors
GA Bar #966458
215 Pryor Street
Atlanta, GA 30303
(404) 524-6400
notices@kingkingllc.com

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**NOTICE OF REQUIREMENT OF RESPONSE TO MOTION TO AVOID
JUDICIAL LIEN ON EXEMPT PROPERTY AND OF TIME TO FILE SAME**

NOTICE IS HEREBY GIVEN that, on June 10, 2016, a Motion to Avoid Judicial Lien on Exempt Property pursuant to 11 U.S.C. § 522(f) was filed in this case.

NOTICE IS FURTHER GIVEN that, pursuant to BLR 6008-2, Respondent must file a response to the Motion within 21 days after service, and serve a copy of said response upon Movant. If no response is timely filed and served, the Motion will be deemed unopposed and the Bankruptcy Court may enter an order granting the relief sought.

Dated: June 10, 2016

KING & KING LAW LLC

By: /s/ 
Seth A. Evans, Attorney for Debtors
GA Bar #966458
215 Pryor Street
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on June 10, 2016, I served a copy of the Motion to Avoid Judicial Lien on Exempt Property, together with the Notice of Requirement of Response to Motion to Avoid Judicial Lien on Exempt Property and of Time to File Same upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon to ensure delivery to:

Neil C. Gordon
171 17th Street, #2100
Atlanta, GA 30363

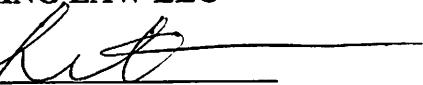
Gregory Bernard Dawson, II
249 Napoleon Drive, SW
Atlanta, GA 30314

Multibank 2009-1 RES-ADC Venture LLC
9449 Science Center Dr.
Minneapolis, MN 55428

Multibank 2009-1 RES-ADC Venture LLC
c/o April Reeves Freeman, Attorney
1390 Peachtree Street NE
Suite 1030
Atlanta, GA 30309

Multibank 2009-1 RES-ADC Venture LLC
c/o The Corporation Trust Company, Registered Agent
Corporation Trust Center
1209 Orange St.
Wilmington, DE 19801

KING & KING LAW LLC

By: /s/ 
Seth A. Evans, Attorney for Debtors
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